

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

1200 Sixth Avenue, Suite 900 Seattle, WA 98101-3140

> OFFICE OF ECOSYSTEMS, TRIBAL AND PUBLIC AFFAIRS

October 5, 2011

Michael L. Rassbach District Ranger, Walla Walla Ranger District Umatilla National Forest 1415 West Rose Street Walla Walla, Washington 99362

Re:

U.S. Environmental Protection Agency (EPA) Comments on the final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for North End Sheep Allotment, Umatilla National Forest. EPA Project Number: 09-020-AFS.

Dear Mr. Rassbach:

The EPA has reviewed US Forest Service's FEIS for the North End Sheep Allotment on the Walla Walla Ranger District of the Umatilla National. Our review was conducted in accordance with our responsibilities under National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The EIS evaluates the continuation of domestic sheep grazing on the North End Sheep Allotment. A key issue identified is the potential impact to Rocky Mountain bighorn sheep from interaction with domestic sheep. The range of alternatives chosen for analysis reflect the need to authorize grazing consistent with the Forest Plan while effectively keeping permitted sheep separated from bighorn sheep range. The FEIS and ROD selected Alternative 4, which continues to allow grazing with the greatest reduction in both the number of ewe/lamb pairs and acreage available for grazing (from 101, 000 acres to 52,600 acres). Alternative 4 also removes grazing from the North Fork Umatilla Wilderness Area.

The EPA raised environmental concerns on the draft EIS related to risk of disease spread (bacterial pneumonia) from interaction between domestic and bighorn sheep. We support the selection of Alternative 4, as we believe that the listed management requirements along with the coordination of monitoring with Oregon Department of Fish and Wildlife should ensure adequate protection of bighorn sheep and other wildlife. The selection of Alternative 4 and ongoing monitoring resolve our concerns on the draft EIS.

The EPA also recommended that the FEIS include additional information regarding impaired stream segments, parameters that streams are listed for, and Total Maximum Daily Load (TMDL) allocations. We appreciate the additional information regarding load allocations and discussion of streams that have been delisted based on TMDL implementation. Grazing can impact water quality by disturbing riparian habitat and increase erosion which together can increase temperature and sediment. The TMDLs for the three sub-basins in the project area include allocations for sediment and temperature. Although we acknowledge that there are no streams currently listed within the allotment boundary, we continue to recommend monitoring to ensure that beneficial uses are protected and that TMDL targets continue to be met.

Thank you for this opportunity to comment on the FEIS. If you have any questions or concerns please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Lynne McWhorter of my staff at (206) 553-0205 or by electronic mail at mcwhorter.lynne@epa.gov.

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Christine B. Reichgott, Unit Manager

Environmental Review and Sediment Management Unit